

August 06, 2024

Nathan Ochsner, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION

UNITED STATES OF AMERICA

v.

TOMAS DON WRIGHT

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§
§
§

CRIMINAL NO. **L- 24-CR-872**

INDICTMENT

DS

THE GRAND JURY CHARGES THAT:

COUNT ONE

On or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

TOMAS DON WRIGHT,

knowing that he had been convicted of a crime punishable by imprisonment for a term exceeding one year, knowingly possessed at least one of the following firearms:

Item No.	Firearms				
	Manufacturer	Model	Type	Caliber	Serial Number
1.	Palmetto State Armory	M4 Carbine	Rifle	5.56-millimeter	W1914607
2.	Hatfield	SGL	Shotgun	.410 gauge	410S20-004496
3.	Winchester	67-22	Rifle	.22	None
4.	Taurus	PT840	Pistol	.40	SFS38304
5.	Ruger	P95	Pistol	9-millimeter	306-72936
6.	Rossi	461	Revolver	.357	DU269529

and the firearms were in and affecting commerce.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(8).

COUNT TWO

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern

District of Texas and within the jurisdiction of the Court, Defendant,

TOMAS DON WRIGHT,

did knowingly possess a machine gun, that is, at least one privately made component referred to as a metal drop-in auto-sear without a serial number and without an industry marking.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT THREE

On or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

TOMAS DON WRIGHT,

did knowingly possess a machine gun, that is, at least one privately made component referred to as polymer drop-in auto-sear without a serial number and without an industry marking.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FOUR

On or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

TOMAS DON WRIGHT,

did knowingly possess a machine gun, that is, at least one privately made component referred to as a “Glock Switch” without a serial number and without an industry marking.

In violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FIVE

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

TOMAS DON WRIGHT,

knowingly possessed at least one of the following firearms:

<u>Firearms</u>			
Item No.	Manufacturer	Description	Purpose
1.	Privately Manufactured Component	Polymer drop-in auto-sear	Machine Gun Conversion Device
2.	Privately Manufactured Component	Metal drop-in auto-sear	Machine Gun Conversion Device
3.	Privately Manufactured Component	Polymer "Glock switch"	Machine Gun Conversion Device

which were made in violation of the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5822, 5861(c) and 5871.

COUNT SIX

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

TOMAS DON WRIGHT,

knowingly possessed at least one of the following firearms:

<u>Firearms</u>			
Item No.	Manufacturer	Type	Description
1.	Privately Manufactured Component	Polymer drop-in auto-sear	Machine Gun Conversion Device
2.	Privately Manufactured Component	Metal drop-in auto-sear	Machine Gun Conversion Device
3.	Privately Manufactured Component	Polymer Glock switch	Machine Gun Conversion Device

that were not registered to the Defendant in the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT SEVEN

Beginning on or about **June 24, 2024**, through on or about **July 17, 2024**, in the Southern District of Texas and within the jurisdiction of the Court, Defendant,

TOMAS DON WRIGHT,

knowingly possessed at least one of the following firearms:

Item No.	Manufacturer	Type	Description
1.	Privately Manufactured Component	Polymer drop-in auto-sear	Machine Gun Conversion Device
2.	Privately Manufactured Component	Metal drop-in auto-sear	Machine Gun Conversion Device
3.	Privately Manufactured Component	Polymer Glock switch	Machine Gun Conversion Device

that were not identified by a serial number as required by the National Firearms Registration and Transfer Record.

In violation of Title 26, United States Code, Sections 5861(i), and 5871.

NOTICE OF FORFEITURE
18 U.S.C. 922(g) and (o)
(Counts 1-4)

Pursuant to Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

TOMAS DON WRIGHT,

that upon conviction of a violation of Title 18, United States Code, Section 922(g) or (o), all firearms involved in said violation are subject to forfeiture, including but not limited to the following:

- 1) thirteen (13) privately made components referred to as metal drop-in auto-sears, without a serial number and industry markings.
- 2) forty-six (46) privately made components referred to as polymer drop-in auto-sears without a serial number and industry markings.
- 3) two (2) privately made components referred to as “Glock Switches” without a serial number and industry markings.
- 4) one (1) Palmetto State Armory, Model: M4 Carbine, serial number W1914607, 5.56-millimeter rifle
- 5) one (1) Hatfield, Model: SGL, .410 gauge shotgun, serial number 410S20-004496
- 6) one (1) Winchester, Model: 67-22, .22 caliber rifle, no serial number
- 7) one (1) Ruger, Model: P95, 9-millimeter pistol, serial number 306-72936
- 8) one (1) Rossi, Model: 461, .357 caliber pistol, serial number DU269529
- 9) one (1) Taurus, Model: PT840, .40 caliber pistol, serial number SFS38304

NOTICE OF FORFEITURE
26 U.S.C. §§ 5861(c)–(d),(i)
(Counts 5–7)

Pursuant to Title 26, United States Code, Section 5872 and Title 28, United States Code, Section 2461(c), the United States gives notice to Defendant,

TOMAS DON WRIGHT,

that upon conviction of a violation of Title 26, United States Code, Section 5861(c), (d), or (i), all firearms involved in said violation are subject to forfeiture, including but not limited to the following:

- 1) thirteen (13) privately made components referred to as metal drop-in auto-sears, without a serial number or industry markings.
- 2) forty-six (46) privately made components referred to as polymer drop-in auto-sears without a serial number or industry markings.
- 3) two (2) privately made components referred to as “Glock switches” without a serial number or industry markings.

A TRUE BILL:

ORIGINAL SIGNATURE ON FILE

ALAMDAR S. HAMDANI
UNITED STATES ATTORNEY



Christine A. Cortez
Assistant United States Attorney

L- 24-CR-872

LAREDO

DIVISION

NO.

DS

FILE: 24-04742

MAG#: 24-00902

INDICTMENT

Filed: August 6, 2024

Judge: _____

ATTORNEYS:

UNITED STATES OF AMERICA

VS.

ALAMDAR S. HAMDANI, USA
CHRISTINE A. CORTEZ, AUSA

TOMAS DON WRIGHT

CHARGES:

Ct. 1: Possession of Firearm and Ammunition by a person having been convicted of a crime punishable by imprisonment for a term exceeding one year
[18 USC 922(g)(1), 924(a)(8)]

Cts. 2–4: Illegal Possession of a Machine Gun
[18 USC 922(o), 924(a)(2)]

Ct. 5: Possession of Firearm Made in Violation of the National Firearms Act
[26 USC 5822, 5861(c), and 5871]

Ct. 6: Possession of Unregistered Firearm Made in Violation of the National Firearms Act
[26 USC 5841, 5861(d), and 5871]

Ct. 7: Possession of Firearm Unidentified by Serial Number Made in Violation of the National Firearms Act
[26 USC 5861(i), and 5871]

Notice of Forfeiture

TOTAL COUNTS: 7

PENALTY:

Ct. 1: 0 to 15 years and/or \$250,000 fine, \$100 special assessment,
Not more than a three-year term of supervised release

Cts. 2–7: 0 to 10 Years and/or \$250,000 fine, \$100 special assessment,
Not more than a three-year term of supervised release